

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OMEGA SA and SWATCH SA,

Plaintiffs,

-against-

375 CANAL, LLC, JOHN DOES 1 - 50
and XYZ COMPANIES 1 - 50,

Defendants.

Civil Action No.: 12-CV-6979 (PAC)

DECLARATION OF HAL R. LIEBERMAN

Hal R. Lieberman declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a partner at the law firm of Emery Celli Brinckerhoff & Abady LLP, attorneys for former Plaintiffs' counsel, Joshua Paul, for the limited purpose of responding to motions for sanctions.

2. I respectfully move this Court to withdraw as counsel of record for non-party Joshua Paul.

3. I filed a limited notice of appearance in this case on October 5, 2017 for the limited purpose of responding to any sanctions motion against Mr. Paul in this action. Dkt. 163.

4. The sanctions motions were decided by the Court on March 13, 2018. No sanctions were imposed. Dkt. 206.

5. Accordingly, my representation of Mr. Paul in this action is concluded.

6. I respectfully request that the Court grant the motion to withdraw my appearance for Mr. Paul in this action.

Dated: New York, New York
March 26, 2018

/s/
HAL R. LIEBERMAN